

United States District Court
District of Massachusetts
Western Division

CIVIL ACTION NO. 03CV11633 MAP
NO. 03CV30213 KPN

JT Glover, III, pro se)
)
)
Plaintiff,)
)
v.)
)
Massachusetts Department of)
Mental Retardation, et al)
)
)
Defendants.)

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U.S. DISTRICT COURT
DISTRICT OF MASS.

**PLAINTIFF'S ASSENTED TO MOTION TO CONSOLIDATE CIVIL ACTION
NO: 03CV11633 MAP AND NO: 03CV30213 KPN**


Mr. JT Glover III, on behalf of himself, submits this assented to motion pursuant to local rules 42 (A), to consolidate the above mentioned civil action cases which are both pending in the US District Court of Springfield.

1. On September 2/3 2003, Mr. Glover filed complaints in the US District Courts of Boston and Springfield pursuant to 42 USC Section 1983 against individuals affiliated with the Massachusetts Department of Mental Retardation because of their individual participation in the mishandling of specific investigations and appeal accordance to DMR Regulations, 115 CMR 9.00, and the acts and omissions partaken by these individuals towards the plaintiff's longstanding effort to redress these accumulating grievances as well.
2. On October 16, 2003, via Certified First Class Mail delivery, Mr. Glover provided a verified amended version of this complaint to the US District Court of Springfield.

3. Mr. Glover filed an amended complaint because he wanted to ensure specific employees of the Massachusetts Department of Mental Retardation were not only being sued in their official capacities; but in their individual capacities as well. It was Mr. Glover's wish to cite additional specifics in the amended version of his complaint pursuant to US Title 42 Section 1983; Massachusetts General Laws 19C; and DMR Regulations, 115 CMR 9.00.
4. On October 31, 2003, Mr. Glover and Assistant Attorney General Timothy Jones conferred about this matter agreeing that transferring civil action no. 03CV11633 to the US District Court of Springfield would benefit all parties the plaintiff, the defendants, and their legal counsel.
5. On November 4, 2003, Mr. Glover filed an assented to motion to transfer a case existing in the US District Court of Boston to the US District Court of Springfield involving a common question of law. This motion was granted on November 6, 2003 and subsequently, this transferred civil action was assigned case number 03cv11633 MAP.
6. Consolidating these cases would make it easier for legal counsel to conduct activities such as pre-trial conferences, discovery phases including, but not limited to, Depositions, Written Interrogatories, and Requests of Production of Documents, and addressing other matters as well.
7. Furthermore, on November 14, 2003, Assistant Attorney General Jones left a message on Mr. Glover's answering machine asking him to file this additional motion to consolidate these two specific cases into one single case.
8. Although by filing this motion, Mr. Glover feels the conduct of each of the named defendants should be individually scrutinized since these alleged deprivations occurred on an accumulating where these individuals had direct knowledge and/or contributed towards the mishandling of these specific investigations and appeal report conducted by the Divisions of Investigations of the Department of Mental Retardation and Mr. Glover's prolonged effort to redress these circumstances.

Wherefore, for the above mentioned reasons, the plaintiff requests that this court grant his assented to motion to consolidate the above-mentioned civil actions into one single case pursuant to local rules 42 (A).

THE PLAINTIFF,

By: 
JT Glover, III, pro se
46 Quincy Street #5
North Adams, MA 01247
(413) 664-9093

Certificate of Service

I, JT Glover III, hereby certify that on November 25, 2003, I served a copy of the foregoing **Plaintiff's Assented to Motion to consolidate Civil Action 03CV11633 MAP and 03CV30213 KPN into one case**, by First-Class Mail, postage prepaid, upon:

Assistant Attorney General Timothy M. Jones
Office of the Attorney General
Western Massachusetts Division
1350 Main Street
Springfield, MA 01103-1629


JT Glover III